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*Attorneys for Defendant
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
RESPONSE PURSUANT TO ORDER
REQUIRING RESPONSE
DECLARATIONS (DKT NO. 1601)**

Filed/Lodged Concurrently with:

1. Declaration of Neel Chatterjee
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this Administrative Motion to File Under Seal Portions of Its Response Pursuant to Order Requiring Response Declarations (Dkt No. 1601) (the “Response”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following document:

| Document | Portions to Be Filed Under Seal | Designating Parties |
|----------|---------------------------------|---------------------|
| Response | Green-highlighted portions | Waymo |
| Response | Blue-highlighted portions | Uber and Ottomotto |

The above referenced portions of the Response contain information designated by Plaintiff Waymo LLC (“Waymo”) or Defendants Uber Technologies, Inc. (“Uber”) and Ottomotto LLC (“Ottomotto”) as either Highly Confidential—Attorneys’ Eyes Only” or “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as to the merits of the confidentiality designations in these documents.

Otto Trucking anticipates that Waymo, Uber, and Ottomotto will file declarations in accordance with Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Motion and its supporting documents that merit provisional sealing.

1 Dated: September 18, 2017

Respectfully submitted,

2 By: /s/ Neel Chatterjee
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on September 18, 2017. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 18th day of September in Menlo Park, California.

/s/ Neel Chatterjee
Neel Chatterjee